



Amy G. Rabinowitz
Counsel

January 26, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 03-87

Dear Secretary Cottrell:

I am enclosing the semi-annual report on double poles of Massachusetts Electric Company and Nantucket Electric Company.

In addition, please take Judith Lee's name off the service list in this proceeding, and replace it with mine.

Thank you very much for your time and attention to these matters.

Very truly yours,

Amy G. Rabinowitz

cc: Service List

SEMI-ANNUAL DOUBLE POLE STATUS REPORT OF
MASSACHUSETTS ELECTRIC COMPANY
AND
NANTUCKET ELECTRIC COMPANY

I. Introduction

This report sets forth the status of double poles in the service territory of Massachusetts Electric Company and Nantucket Electric Company (collectively “Mass. Electric” or “Company”). Mass. Electric provides this report in response to the Department’s November 28, 2003 report (“Report”) to the Legislature’s Committees on Ways and Means and the Joint Committee on Government Relations, pursuant to Section 110 of Chapter 46 of the Acts of 2003 relative to reducing the number of double utility poles within the Commonwealth, in which the Department said that it would require all pole owners to file semi-annual reports on the status of double poles. (Report, pages 15-16)

In brief, as of October 2004, the Company has approximately 8,467 doubled poles on its system,¹ down from 11,218 in January 2004. This represents an approximately twenty-one percent decrease in the number of double poles during that time. Mass. Electric attributes this decrease in part to the effectiveness of the Pole Lifecycle Management system (“PLM”) which is, as reported earlier, the common database established by Massachusetts pole owners, including Verizon, NStar, Western Massachusetts Electric Company, and Unitil, that tracks doubled pole locations and transfer status for each company attached to these poles, notifies these attaching companies of their obligations via e-mail, and provides reporting and management tools.

¹ These numbers are subject to confirmation with Verizon.

.In addition, increased use of private contractors, better coordination with municipalities, and new policies for the installation of new poles also account for the decrease in the number of double poles.

II. Current Status

As of October 2004, as reported by PLM, approximately 8,467 doubled poles exist in the Company's system,² down from 11,218 in January. Of these 8,467 doubled poles, 628 are ready for removal by the Company and 1,419 are ready for the Company to transfer its facilities. These numbers represent a decrease of approximately twenty-one percent in the number of doubled poles (2,302 poles) in the Company's service territory and a decrease of approximately twenty-nine percent in the number of poles (848 poles) awaiting action by the Company, as compared to the February 2004 numbers reported in the Company's March 2004 Report. During this period, the Company worked with municipal fire alarm systems and cable television operators to coordinate completion of their transfers. The number of poles waiting for fire alarm or cable transfers was reduced from 2,982 to 2,294, a reduction of 688 poles, an approximately twenty-three percent reduction.

III. Mass. Electric Measures to Address Double Pole Backlog

Mass. Electric has instituted a double-pronged approach to eliminate its backlog of double poles as soon as reasonably practicable. This approach addresses the issues that delay the removal of double poles that are under the direct control of the Company.

² These numbers are subject to confirmation with Verizon.

Mass. Electric is making greater use of private contractors to manage double pole activities. Currently, Mass. Electric is using private contractors to work on the existing backlog of poles ready for transfer as well as the poles that become ready for transfer in the future. Mass. Electric is also using contractors to remove the poles that are ready for removal by the Company. The scope of this pole removal contract covers work on the existing backlog of poles ready for removal, as well as the work on the poles that become ready for removal in the future. Mass. Electric is already seeing that this greater utilization of private contractors has cut the number of poles awaiting transfer or removal by the Company. Mass. Electric expects to have approximately 1,250 poles awaiting transfer and approximately 300 poles awaiting removal by the Company by late January 2005, about half number of poles awaiting work by the Company in January of 2004. These figures will remain fairly constant going forward.

IV. Changes in Mass. Electric Policies for New Poles

The Company is also revising its policies with regard to the installation of new poles so that going forward, as existing poles are replaced with new poles, the existing poles are removed within the ninety day period mandated by M.G.L. c. 164, § 34B. Mass. Electric intends to complete its facilities transfers and pole removals within fifteen days. To this end, Mass. Electric has expanded the use of contractors in the completion of facilities transfers from existing poles to new poles and in the performance of pole removal work. Mass. Electric will continue to emphasize the need for all pole owners and users to utilize PLM to coordinate and manage their facilities transfer and pole removal activities and the importance of timely and accurate data entry by all parties. Finally,

Mass. Electric has increased and will continue to increase its use of the cut-and-kick method of pole replacement, which reduces the time required to remove a double pole by eliminating one final trip to the pole to remove the last piece of pole. About one-half of all pole replacements can be performed using the cut-and-kick method.

V. Conclusion

Mass. Electric has significantly reduced its backlog of double poles, and anticipates further reductions going forward. Mass. Electric is confident that the steps it has described in this status report will be effective in reducing its backlog of double poles and will facilitate the prompt removal of any poles that are ready for removal by the Company. The Company will update the Department on the status of its efforts to reduce double poles in its next semi-annual report.